

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

B.P., H.A., and S.H., individually, and on behalf of all others similarly situated, ]  
Plaintiffs, ] No.: 2:23-cv-00071-TRM-JEM  
v. ] PLAINTIFFS' DEMAND  
CITY OF JOHNSON CITY, TN., et al., ] JURY TRIAL  
Defendants. ]

---

**NOTICE OF SERVICE OF DEFENDANT CITY OF JOHNSON CITY, TENNESSEE'S  
RESPONSE TO PLAINTIFFS' NINTH REQUEST FOR PRODUCTION OF  
DOCUMENTS**

---

The Defendant, Johnson City, Tennessee, hereby appears, by and through counsel and provides this Court Notice that Defendant's Response to Plaintiffs' Ninth Requests for Production of Documents and accompanying exhibits were provided to all counsel of record via e-mail on this the 20<sup>th</sup> day of September, 2024.

Respectfully submitted this 20<sup>th</sup> day of September, 2024.

CITY OF JOHNSON CITY, TN

By:s/ Emily C. Taylor

Emily C. Taylor, BPR # 027157  
**WATSON, ROACH, BATSON  
& LAUDERBACK, P.L.C.**  
P.O. Box 131  
Knoxville, TN 37901-0131  
Phone: (865) 637-1700  
Email: [etaylor@watsonroach.com](mailto:etaylor@watsonroach.com)

K. Erickson Herrin, BPR # 012110  
**HERRIN, McPEAK & ASSOCIATES**  
515 East Unaka Avenue  
P. O. Box 629  
Johnson City, TN 37605-0629  
Phone: (423) 929-7113  
Email: lisa@hbm-lawfirm.com

Jonathan P. Lakey, BPR # 016788  
**BURCH, PORTER & JOHNSON, PLLC**  
130 North Court Avenue  
Memphis, TN 38103  
Phone: (901) 524-5024  
Email: jlakey@bpjlaw.com

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system:

Heather Moore Collins  
Ashley Shoemaker Walter  
HMC CIVIL RIGHTS LAW, PLLC  
7000 Executive Center Drive, Suite 320  
Brentwood, TN 37027  
heather@hmccivilrights.com  
ashley@hmccivilrights.com  
*Counsel for Plaintiffs*

Vanessa Baehr-Jones  
ADVOCATES FOR SURVIVORS OF  
ABUSE, PC  
4200 Park Boulevard No. 413  
Oakland, CA 94602  
vanessa@advocatesforsurvivors.com  
*Counsel for Plaintiffs*

Kristin Ellis Berexa  
Ben C. Allen  
FARRAR BATES BEREXA  
12 Cadillac Drive, Suite 480  
Brentwood, TN 37027-5366  
kberexa@fbb.law  
ballen@fbb.law  
*Counsel for Toma Sparks in his individual capacity*

Daniel H. Rader III  
Daniel H. Rader IV  
André S. Greppin  
MOORE, RADER & YORK PC  
46 N. Jefferson Avenue  
P.O. Box 3347  
Cookeville, TN 38502-3347  
danrader@moorerader.com  
danny@moorerader.com  
andre@moorerader.com  
*Counsel for Kevin Peters in his individual capacity*

Kevin Osborne  
Elizabeth Kramer  
Julie Erickson  
ERICKSON KRAMER OSBORNE, LLP  
44 Tehama Street  
San Francisco, CA 94105  
[kevin@eko.law](mailto:kevin@eko.law)  
[elizabeth@eko.law](mailto:elizabeth@eko.law)  
[julie@eko.law](mailto:julie@eko.law)  
*Counsel for Plaintiffs*

Keith H. Grant  
Laura Beth Rufolo  
Philip Aaron Wells  
ROBINSON, SMITH & WELLS, PLLC  
Suite 700, Republic Centre  
633 Chestnut Street  
Chattanooga, TN 37450  
[kgrant@rsrlaw.com](mailto:kgrant@rsrlaw.com)  
[lrufolo@rsrlaw.com](mailto:lrufolo@rsrlaw.com)  
[awells@rsrlaw.com](mailto:awells@rsrlaw.com)  
*Counsel for Jeff Legault, in his individual capacity*

Dated this 20<sup>th</sup> day of September, 2024.

s/ Emily C. Taylor  
Emily C. Taylor, BPR # 027157  
Phone: (865) 637-1700  
Email: [etaylor@watsonroach.com](mailto:etaylor@watsonroach.com)